

DATE: January 26, 2011

TOPIC: Gulfco Marine Maintenance Superfund Site

ACTION REQUIRED: None - update on site progress

CURRENT STATUS:

- Tank removal in progress field work original completion by 1/27/2011.
- All tanks have been removed from site, however, contaminated soil found below several tanks; visually stained soil zone at 2½-ft to 5-ft below Tank #6 extending at least 10-feet to the west; samples collected to ID contaminants and determine response.
- Removal public comment period 1/10/11 to 2/8/2011; post card mail-out & newspapers notices published 1/6/2011 & 1/8/2011 – no comments received to date.
- PRP is preparing draft RI & BERA Reports both due by 2/7/2011.

DRAFT/PREDECISIONAL ACTIONS NEEDED:

- Complete tank removal.
- Place institutional controls to prevent water wells & residential land use, and require vapor intrusion mitigation in any future commercial/industrial buildings; heavy industrial/waterfront zoning in place.
- Create O&M Plan (including ground water monitoring and cap inspection/repair).
- Repair cap over former impoundments as part of O&M Plan.
- Use existing monitoring wells for ground water monitoring.
- Assess ground water plume containment in 5-year reviews; complete additional ground water control/containment actions if ground water plume migrates.

ACHIEVING CONSTRUCTION COMPLETION IN 2011:

- Proposed Plan complete 6/6/2011.
- 60-Day Public Comment Period 6/26/2011 to 8/24/2011.
- Issue Record of Decision 9/15/2011.
- Construction completion date 9/19/2011:
- Uses accelerated FS Report schedule compared to schedule in the UAO for the FS Report (about 3 month gain); conference call with PRPs on 1/21/2011, initial responses:
 - Dow: would be very happy to work cooperatively with EPA to get this done as expeditiously as possible;
 - Parker: accelerating to the end of the project makes sense; shortening the overall project length usually saves money; and wants to advance this idea if we are all on the same footing and have confidence in the steps forward.
- Schedule includes a 60-day public comment period; if a 30-day extension is not requested, then Construction Completion will move forward one month.

ENFORCEMENT SENSITIVE PRE-DECISIONAL

Enforcement Activities:

- Enforcement Assessment will follow RD/RA guidance for SNL for post-ROD activities and cost recovery
- PRP Search Update will review smaller parties for liability based on RI/FS Data













